

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.
Rashann Salaam Perkins

Case: 2:21-mj-30549
Assigned To : Unassigned
Case No. Assign. Date : 11/18/2021
Description: CMP USA v. PERKINS
(SO)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 12, 2021 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. §§ 841(a)(1), 846

Possession with intent to distribute and conspiracy to distribute
controlled substances.

This criminal complaint is based on these facts:

See attached affidavit

☐ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: November 18, 2021

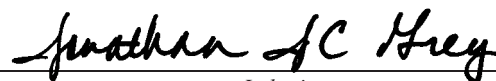
City and state: Detroit MI



Complainant's signature

Jeremy D. Nissen, U.S. Postal Inspector

Printed name and title



Judge's signature

Hon. Jonathan J.C. Grey, US Magistrate Judge

Printed name and title

AFFIDAVIT

I, Jeremy Nissen, being duly sworn on oath, state as follows:

1. I am a United States Postal Inspector assigned to the Allen Park Domicile of the Detroit Division of the U.S. Postal Inspection Service (USPIS). I am sworn and empowered to investigate criminal activity involving or relating to the U.S. Postal Service. I am assigned to investigate the unlawful transportation of contraband, including Title 21 controlled substances, through the United States Mail. I have been a Postal Inspector since April 2021. Prior to becoming a United States Postal Inspector (USPIS), I was a Drug Enforcement Administration (DEA) Special Agent for 19 years where I have received extensive training in the identification, detection and investigation of techniques utilized by individuals engaged in illegal narcotics trafficking. As part of my duties, I investigate incidents involving violations related to Title 21, United States Code, Sections 841(a)(1), 846, 843(b), and substances mailed in violation of Title 18, United States Code, Section 1716.

2. The facts contained in this affidavit are based on my review of information provided to me by other law enforcement agents, witnesses, and individuals with knowledge of this matter as well as my personal involvement and investigation and review. The information provided below is for the limited purpose of obtaining the requested criminal complaint and does not contain all details or all facts of which I am aware of involving this investigation.
3. This Affidavit is made in support of an application for a criminal complaint and warrant to arrest Rashann Salaam Perkins, for violations of Title 21, United States Code, Section 841(a)(1) and 846, possession with intent to distribute and conspiracy to distribute controlled substances.

SUMMARY OF INVESTIGATION

4. On November 12, 2021, U.S. Postal Inspectors intercepted a USPS Priority Mail Express parcel (hereafter "Subject Parcel") at a Postal facility in Michigan. The parcel, was addressed to 50XX Pennsylvania., Detroit, Michigan 48213 (full address known to affiant) with a return address in Phoenix, Arizona. The Subject Parcel was mailed on November 8, 2021, from Phoenix, Arizona.

5. Pursuant to further investigation, including a positive alert by a certified and trained narcotics detection canine, on November 12, 2021, Postal Inspectors obtained and executed a federal search warrant on the Subject Parcel and discovered that it contained the following: one padded envelope with suspected fentanyl pills. The pills are light blue in color and bear “M-30” stampings to make them appear to be legitimate pharmaceutical Oxycodone tablets. The total weight of the suspected pills was approximately 1400 grams. A controlled delivery of the Subject Parcel was scheduled for November 17, 2021.

6. On November 17, 2021, at approximately 11:00 a.m., an undercover U.S. Postal Inspector, posing as a U.S. Postal Service Letter Carrier, delivered the Subject Parcel to the target address. The suspected fentanyl pills had been replaced with a sham substance fashioned to appear similar to the seized contraband. The undercover U.S. Postal Inspector knocked on the front door of the target address several times and was met with negative results. The Subject Parcel was left on the front porch leaning against the front door.

7. Shortly after, an unknown African American male, later positively identified as Rashann Salaam Perkins, arrived at the target address and retrieved the Subject Parcel. Perkins contacted a resident at the target address. Law enforcement observed what appeared to be a monetary exchange between Perkins and a resident at the target address (later confirmed to be a \$100 payment). Perkins returned to his vehicle with the Subject Parcel. As Perkins drove away, law enforcement attempted to conduct a traffic stop. Perkins fled the scene at a high rate of speed. After a brief chase, Perkins lost control of his vehicle and crashed into a telephone pole. Perkins fled on foot and was eventually apprehended by law enforcement.
8. During a post arrest interview Rashaan Perkins admitted to his retrieval of the Subject Parcel from the porch and admitted that he knew the package to contain controlled substances. Later investigation confirmed that Perkins paid the occupant of the house where the pills were delivered \$100 by for the use of her address.
9. Based upon my training and experience and knowledge of wholesale versus retail price of counterfeit opioid pills, the potential street value of the approximate 12,000 – 15,000 pills seized would be hundreds of

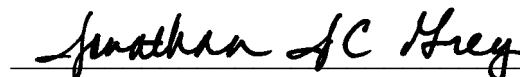
thousands of dollars, and as such, the attempted possession of the counterfeit pills is indicative of possession with the intent to further distribute.

10. Based upon the foregoing, there is probable cause to believe Rashann Salaam Perkins has knowingly violated Title 21, United States Code, Sections 841(a)(1) and 846, attempted possession with intent to distribute and conspiracy to distribute controlled substances. Accordingly, this Affiant respectfully request that this Court issue a complaint and arrest warrant.



Jeremy Nissen
Postal Inspector

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Hon. Jonathan J.C. Grey
Magistrate Judge, United States District Court
Eastern District of Michigan

Detroit, Michigan

Date: November 18, 2021